

EXHIBIT 2

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

IN RE:) Case No:
) 3:19-bk-07235
CUMMINGS MANOOKIAN, PLLC,) Chapter 7
)
Debtor,) Honorable Charles
_____) M. Walker
)
Jeanne Ann Burton, in her)
capacity as Chapter 7)
Trustee,)
)
Plaintiff,)
)
v.) Adv. No:
) 3:20-ap-90002
Hagh Law, PLLC, Afsoon Hagh,)
Manookian PLLC,)
)
Defendants.)
_____)

Deposition of
PHILLIP YOUNG
Taken on behalf of the Defendants
Commencing at 10:14 a.m.
April 21, 2022

Reported by:
Harpeth Court Reporters
Franklin, Tennessee
Sabrina L. Schneider, LCR No. 455

1 APPEARANCES:

2 For the Witness:

3 JUSTIN CAMPBELL, ESQ.
4 Thompson Burton, PLLC
5 One Franklin Park
6 6100 Tower Circle, Suite 200
7 Franklin, Tennessee 37067
8 (615) 465-6008
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7 For the Defendant HAGH LAW, PLLC, and AFSOON HAGH:

8 CRAIG V. GABBERT, JR., ESQ.
9 Bass Berry & Sims
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11 Nashville, Tennessee 37201
12 (615) 742-6277
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11 For the Defendant MANOOKIAN, PLLC:

12 JOHN SPRAGENS, ESQ.
13 Spragens Law, PLC
14 311 22nd Avenue North
15 Nashville, Tennessee 37203
16 (615) 983-8900
17 john@spragenslaw.com

16 Also Present:

17 Jeanne Ann Burton, Trustee
18 Brian Manookian
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I N D E X

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By Mr. Spragens.....5

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None were marked

1 The deposition of PHILLIP YOUNG, was taken
2 on behalf of the Defendants on the 21st day of April,
3 2022, in the offices of the U.S. Customs House, 701
4 Broadway, Nashville, Tennessee, for all purposes under
5 the Federal Rules of Civil Procedure.

6 The formalities as to notice, caption,
7 certificate, et cetera, are waived. All objections,
8 except as to the form of the questions, are reserved
9 to the hearing.

10 It is agreed that Sabrina L. Schneider, being
11 a Notary Public and Court Reporter for the State of
12 Tennessee, may swear the witness, and that the reading
13 and signing of the completed deposition by the witness
14 are reserved.

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1 It was well after my involvement in the state court
2 action.

3 Q. At this point in the receivership, there is
4 not a chose in action that needs to be collected?

5 A. That's correct.

6 Q. Fair to say?

7 A. Yes.

8 Q. I'm talking to you about things you know
9 better than I do, which is always the challenge being
10 a lawyer.

11 MR. SPRAGENS: Let's take a little break.
12 We don't have a whole lot more.

13 (Recess observed.)

14 BY MR. SPRAGENS:

15 Q. Mr. Young, have you ever spoken with Judge
16 Walker in person or on the phone, outside the presence
17 of opposing counsel, about any party or issue in this
18 case?

19 A. No.

20 Q. You heard Judge Walker say that an attorney
21 had called him expressing concerns about being in the
22 same room with Mr. Manookian. Did you hear him say
23 that at the hearing?

24 A. I heard him say that, that somebody had
25 called --

1 MR. CAMPBELL: Objection. Relevance.

2 THE WITNESS: I heard him say that
3 somebody called chambers.

4 BY MR. SPRAGENS:

5 Q. And do you know anything about an attorney
6 calling chambers about Mr. Manookian?

7 A. The only thing that I know about it is the
8 very, very first hearing we had in this case, I called
9 his courtroom deputy to alert her to the fact that a
10 creditor's lawyer had an order of protection. And I
11 didn't know how that was going to work logistically
12 when you have a lawyer who's representing a creditor
13 in the bankruptcy and the debtor's representatives
14 and there was an order of protection down. And so I
15 called to alert them to that so they would know how to
16 handle that. But I don't know if anybody else called.

17 Q. And which creditor are you referring to?

18 A. Chase.

19 Q. And who's the lawyer?

20 A. Dan Puryear.

21 Q. And do you know if Mr. Puryear contacted
22 chambers too about that?

23 A. I don't know.

24 Q. But you contacted chambers to let them know
25 that the Chase parties and Mr. Manookian couldn't be

1 in the same space; is that correct?

2 A. I just told them that I knew there was an
3 order of protection, so logistically I thought that
4 was a potential problem.

5 MR. CAMPBELL: Objection. Relevance.

6 BY MR. SPRAGENS:

7 Q. And did you make any comments about
8 Mr. Manookian posing a risk to any person in the
9 courthouse?

10 A. No.

11 Q. Do you know who in the chambers you talked to?

12 A. It would have been his courtroom deputy. I
13 think it was the person before Lauren. Lauren is the
14 current courtroom deputy, but I think it was the
15 person before her.

16 Q. Did you consider filing a motion to point out
17 whatever that concern was rather than calling chambers
18 ex parte?

19 A. No.

20 Q. And why not?

21 A. Because it was just a logistical issue and we
22 always handle that through the courtroom deputies.

23 Q. Well, it was a logistical issue that
24 implicated bodily safety; is that fair?

25 MR. CAMPBELL: Objection. Relevance.